

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
Alexandria Division**

UNITED STATES OF AMERICA,
Plaintiff,

v.

ZACKARY ELLIS SANDERS,
Defendant.

Case No. 1:20-cr-00143

Judge T.S. Ellis III

UNOPPOSED MOTION FOR ENTRY OF PROTECTIVE ORDER

Zackary Ellis Sanders, by and through counsel, respectfully files this unopposed motion for entry of a Protective Order to govern material disclosed by the defense to the government. The proposed order is attached. The defense has conferred with the government and the government does not oppose entry of the attached order. Mr. Sanders relies on the accompanying memorandum in support.

Respectfully submitted,

/s/

Nina J. Ginsberg (#19472)
DiMuroGinsberg, P.C.
1101 King Street, Suite 610
Alexandria, VA 22314
Telephone: (703) 684-4333
Facsimile: (703) 548-3181
Email: nginsberg@dimuro.com
Email: zdeubler@dimuro.com

/s/

Jonathan Jeffress (#42884)
Jade Chong-Smith (admitted *pro hac vice*)
KaiserDillon PLLC
1099 Fourteenth St., N.W.; 8th Floor—West
Washington, D.C. 20005
Telephone: (202) 683-6150
Facsimile: (202) 280-1034
Email: jjeffress@kaiserdillon.com
Email: jchong-smith@kaiserdillon.com

/s/

Mark John Mahoney (admitted *pro hac vice*)
Harrington & Mahoney
70 Niagara Street
3rd Floor
Buffalo, NY 14202
Telephone: 716-853-3700
Facsimile: 716-853-3710
Email: mjm@harringtonmahoney.com

Counsel for Defendant Zackary Ellis Sanders

CERTIFICATE OF SERVICE

I hereby certify that on this 4th day of June 2021, the foregoing was served electronically on the counsel of record through the U.S. District Court for the Eastern District of Virginia Electronic Document Filing System (ECF) and the document is available on the ECF system.

/s/ Jonathan Jeffress
Jonathan Jeffress